

Case No. 7:24-cv-00317-DC-RCG MIDLAND/ODESSA DIVISION

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TEXAS MIDLAND/ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

vs.

**SECURITIES AND EXCHANGE
COMMISSION et al,**

Defendant

Case No. 7:24-cv-00317-DC-RCG

**PLAINTIFF'S MOTION FOR LEAVE TO
EXCEED PAGE LIMIT FOR
[DOCUMENT 1] AND [DOCUMENT 2]**

**PLAINTIFF'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR TWO
DOCUMENTS**

Plaintiff Contique Willcot, proceeding *pro se*, respectfully moves this Court for leave to exceed the page limits set by Local Rule CV-7(d) for two filings: Exhibit A: Proposed Supplemental Opposition to Defendant Financial Industry Regulatory Authority, Inc.'s Motion to Dismiss the Second Amended Complaint (ECF No. 105-1, "Supplemental Opposition") and Plaintiff's Reply in Support of Motion for Leave to File Supplemental Opposition (ECF No. 105, "Reply"). The Supplemental Opposition is 8 pages, and the Reply is 12 pages, collectively exceeding the applicable limits by 7 pages. Plaintiff demonstrates good cause for this request under Federal Rule of Civil Procedure 6(b) and the Western District of Texas Pro Se Handbook (the "Handbook"), which encourages judicial flexibility for *pro se* litigants acting in good faith.

I. LEGAL STANDARD

PLAINTIFF'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR [DOCUMENT 1] AND [DOCUMENT 2]

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1 Local Rule CV-7(d)(3) limits responses to non-dispositive motions to 20 pages, and CV-
2 7(d)(2) limits replies to 10 pages, excluding attachments. Federal Rule of Civil Procedure
3 6(b) authorizes the Court to extend procedural limits for good cause, including excusable
4 neglect or to promote fairness. The Handbook advises *pro se* litigants to comply with
5 rules but recognizes that courts may adjust procedural requirements to ensure access to
6 justice (Handbook at 3, 28). The Supreme Court in *Haines v. Kerner*, 404 U.S. 519, 520
7 (1972), instructs courts to construe *pro se* filings liberally to avoid injustice.
8

II. GOOD CAUSE EXISTS TO EXCEED THE PAGE LIMIT

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12 Good cause exists to permit Plaintiff's Supplemental Opposition (8 pages) and Reply (12
13 pages) to exceed the 20-page and 10-page limits due to the necessity of addressing
14 critical new evidence and legal arguments. The Supplemental Opposition responds to
15 FINRA's Motion to Dismiss (ECF No. 96) and incorporates the Securities and Exchange
16 Commission's filing in *Rolo v. SEC* (ECF No. 105-3), which confirms FINRA's *ultra*
17 *vires* actions in the MMTLP trading halt (SAC ¶¶ 17-19, Exs. S, U). The Reply addresses
18 FINRA's Opposition (ECF No. 106). Both filings include key provisions—Section 15A
19 (15 U.S.C. § 78o-3), FINRA By-Laws Article VI, Section 1, and SEC oversight
20 principles—to rebut FINRA's claim that Plaintiff's arguments are a "hypothetical"
21 irrelevant to immunity, requiring detailed analysis under Section 19(b) and Rule 19b-4
22 (15 U.S.C. § 78s(b); 17 CFR § 240.19b-4). Plaintiff's evidence, including FINRA's use
23 of outdated data (SAC ¶25(a), Exs. A, B, C) and opaque halt procedures (SAC ¶17, Exs.
24 S, U), justifies the additional pages to ensure a complete response. The filings are
25
26 concise, causing no prejudice to FINRA, which has responded (ECF No. 106).
27

28 PLAINTIFF'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR [DOCUMENT 1] AND [DOCUMENT 2]

III. PLAINTIFF'S PRO SE STATUS SUPPORTS LENIENCY

As a *pro se* litigant, Plaintiff has diligently complied with procedural rules by filing this Motion. The Handbook encourages courts to consider good-faith efforts by *pro se* litigants (Handbook at 3). The excess pages are necessary to address complex legal issues and new evidence, and denying this request would prejudice Plaintiff's ability to present his case, contrary to *Haines v. Kerner*, 404 U.S. at 520.

IV. ALTERNATIVE REQUEST

Should the Court prefer adherence to the page limits, Plaintiff requests that it consider only the first 20 pages of the Supplemental Opposition and the first 10 pages of the Reply, excluding exhibits, to preserve core arguments.

V. CONCLUSION AND REQUEST FOR RELIEF

Plaintiff respectfully requests that the Court grant leave to exceed the page limits under Local Rule CV-7(d) for the Supplemental Opposition and Reply, deem both filed, and grant such other relief as the Court deems just and proper.

Dated: August 8, 2025

Respectfully submitted,

/s/ Contique Willcot

Contique Willcot, Pro Se

6940 SW 10th Ct

Pembroke Pines, FL 33023

Phone: (954) 274-5173

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CERTIFICATE OF SERVICE

I certify that on August 8, 2025, a true and correct copy of the foregoing document was served via CM/ECF (or, if not registered, via U.S. Mail) on all counsel of record, including:

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(Attorneys for Defendant FINRA)

And all other Defendants' counsel as listed in the docket.

/s/ Contique Willcot

Contique Willcot

Case No. 7:24-cv-00317-DC-RCG MIDLAND/ODESSA DIVISION

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF TEXAS

MIDLAND/ODESSA DIVISION

CONTIQUE WILLCOT,

Plaintiff,

v.

SECURITIES AND EXCHANGE COMMISSION,

FINANCIAL INDUSTRY REGULATORY AUTHORITY,

GTS SECURITIES LLC, ARI RUBENSTEIN,

NEXT BRIDGE HYDROCARBONS, INC.,

JOHN BRDA, and GREGORY MCCABE,

Defendants.

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**PROPOSED ORDER GRANTING PLAINTIFF'S MOTION FOR LEAVE TO
EXCEED PAGE LIMIT**

Before the Court is Plaintiff Contique Willcot's Motion for Leave to Exceed Page Limit

for two filings: Exhibit A: Proposed Supplemental Opposition to Defendant Financial

Industry Regulatory Authority, Inc.'s Motion to Dismiss the Second Amended Complaint

(ECF No. 105-1) and Plaintiff's Reply in Support of Motion for Leave to File

Supplemental Opposition (ECF No. 105), filed on August 8, 2025. Having considered the

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1 Motion, any responses, and the applicable law, the Court finds that good cause exists
2 under Federal Rule of Civil Procedure 6(b) and Local Rule CV-7(d) to grant the
3 requested relief.
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6 **IT IS HEREBY ORDERED** that Plaintiff's Motion for Leave to Exceed Page Limit is
7 **GRANTED.**
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10 **IT IS FURTHER ORDERED** that Plaintiff is permitted to file the Supplemental
11 Opposition (ECF No. 105-1), consisting of 8 pages, exceeding the 20-page limit under
12 Local Rule CV-7(d)(3), and the Reply (ECF No. 105), consisting of 12 pages, exceeding
13 the 10-page limit under Local Rule CV-7(d)(2).
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15 **IT IS FURTHER ORDERED** that the Supplemental Opposition and Reply are deemed
16 filed as of the date of this Order.
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18 **SIGNED** this ____ day of _____, 2025.
19

20 _____
21 UNITED STATES DISTRICT JUDGE
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